

Caree Harper SBN 219048
LAW OFFICES OF CAREE HARPER
401 Wilshire Blvd. Suite 1200
Santa Monica, CA 90401
Tel. (213) 386-5078
Email: chl@attorneyharper.com

Attorneys for Victim "J.H."

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

UNITED STATES OF AMERICA,

CASE NO.: 2:24-00527-SVW

Plaintiffs,

vs.

**CRIME VICTIM'S OBJECTION TO
THE GOVERNMENT'S
UNPRECEDENTED, UNJUSTIFIED
MOTION TO DISMISS**

TREVOR JAMES KIRK

DATE: TBA

TIME: TBA

Defendants.

**PLACE: 350 W. 1st St Ctrm. 10-A
Los Angeles, CA 90012**

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1 **Brief Introduction.**

2 Defendant, TREVOR KIRK, was convicted of a felony by a jury of his peers
3 for violating the civil rights of a senior citizen when he battered her on video
4 without justification. The Defendant has shown **absolutely no remorse** and by and
5 through his attorney in countless interviews, **he has even argued that his actions**
6 **were a “heroic”**. This Honorable Court granted the government’s request to
7 reduce KIRK’s felony conviction over the crime victim’s written and oral
8 objection¹.

9 **BRIEF ARGUMENT AGAINST MOTION TO DISMISS**

10 This Court previously found there was sufficient evidence for a jury to find
11 the Defendant had used “objectively unreasonable force” when Defendants tried to
12 get a new trial after the conviction, and just this month this Court rejected
13 Defendant’s request for bail pending appeal. The U.S. Attorney has now
14 effectively become the advocate for the bad guys in broad daylight and this Court
15 is the only safeguard against open season on the vulnerable, unarmed elderly like
16 “JH” who fall victim to excessive force. No authority exists for Mr. Keenan’s
17 request and **his moving papers do not even bother to give a reason for the motion.**

18 The government calls the motion “unopposed” because they do not **see** the
19 crime victim or her very real injuries, nor do they seem to care (See Attached
20 Exhibits- pictures of victim’s injuries). It is disingenuous, even misleading for the
21 U.S. Attorney to represent that the motion is “unopposed” when the crime victim
22 has opposed even a reduction of the crime from a felony to a misdemeanor in the
23 strongest of terms, both in-person and through filings.

24 The government’s goal is to shield KIRK from any and all punishment at
25 any cost to credibility of the office of the U.S. Attorney. J.H. and her rights need
26 to be protected *from* the U.S. Attorney as each and every one of their actions since

27 _____
28 ¹ Mr. Keenan gave JH five hours notice before they filed this motion. They asked for a meet and confer in the same email. Even with *ex parte* motions, parties give more notice and the shortest notice is 24 hours. Keenan doe not care about JHs or her counsel’s time he only cares about getting KIRK off.

1 the mass exodus of trial attorneys have been blatantly against her and for
2 Defendant KIRK. The Court must step in and provide some measure of justice
3 and accountability as envisioned in 18 U.S.C. § 3771.

4 The U.S. attorney's office has completely relinquished his role as *prosecutor*
5 and turned into Trevor Kirk's most effective defense attorney. Acting as lead
6 counsel for KIRK, Mr. Keenan now seeks to circumvent the bail and new trial
7 rulings to block Trevor Kirk from any and all accountability in this matter. Would
8 Mr. Keenan work so very tirelessly for a convicted felon and against the trial
9 prosecutors, against the victim if she were an elderly White woman and the
10 Deputy was a big Black man convicted of a felony? Hell NO!

11 This racist run of ridiculous motions by the "government" must come to an
12 end. JH requests that the Court look and the Defendant's lack of remorse and flat
13 out refusal to accept any and all responsibility as an attempt to a set blueprint for
14 the Countrywide *pardon-type* motions for what they truly are: a call for police
15 misconduct on minorities. As California goes - so will the nation².

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28 ² Earlier this month Mr. Keenan submitted a memo in Louisville, KY in the Breonna Taylor killing for a one day sentence of an officer there, Case No. 22cr-00084-RGJ-RSE. Again, White cops - Black victim. We never see it in the reverse- ever!

CONCLUSION.

As the government's motion to dismiss seeks to circumvent this Court's ruling as to bail appeal, its ruling as to a New Trial and clearly seeks to **nullify the jury's verdict** it should be DISMISSED.

Defendant KIRK has already received a precedent-setting post-trial reduction of a felony to a misdemeanor and a mere four months sentence.

"J.H." adamantly objects to motion to dismiss the case.

DATED: 7/30/25

LAW OFFICES OF CAREE HARPER

/s/ Caree Harper

Caree Harper

Attorney for "JH"